

1 RENE L. VALLADARES  
2 Federal Public Defender  
3 Nevada State Bar No. 11479  
NISHA BROOKS-WHITTINGTON  
Assistant Federal Public Defender  
411 E. Bonneville, Ste. 250  
Las Vegas, Nevada 89101  
(702) 388-6577/Phone  
(702) 388-6261/Fax  
5 Nisha\_Brooks-Whittington@fd.org

6  
7 Attorney for Victor Ramone Wright

8  
9 **UNITED STATES DISTRICT COURT**  
10  
**DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 VICTOR RAMONE WRIGHT,  
15 Defendant.

Case No. 2:21-cr-00024-APG-DJA

**STIPULATION TO CONTINUE  
PRETRIAL MOTION DEADLINES**  
(Seventh Request)

16  
17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,  
18 United States Attorney, and Daniel J. Cowhig, Assistant United States Attorney, and  
19 Rene L. Valladares, Federal Public Defender, and Nisha Brooks-Whittington, Assistant Federal  
20 Public Defender, counsel for Victor Ramone Wright, that the previously ordered deadline for  
21 filing of pretrial motions be vacated and that the parties herein shall have to and including  
22 November 9, 2022, within which to file the Defendant's pretrial motions previously due  
23 September 27, 2022.

24 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they  
25 shall have to and including November 23, 2022, to file any and all responsive pleadings,  
26 currently due October 11, 2022.

1           IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they  
2 shall have to and including November 30, 2022, to file any and all replies to dispositive motions,  
3 currently due May 2, 2022.

4           The Stipulation is entered into for the following reasons:

5           1.       Counsel for the defendant needs additional time to meet and discuss the  
6 government's proposed resolution with her client; and to determine whether to file a pretrial  
7 motion should her client reject the government's proposed resolution.

8           2.       The defendant is not incarcerated and does not object to the continuance.

9           3.       The parties agree to the continuance.

10          4.       The additional time requested herein is not sought for purposes of delay, but  
11 merely to allow counsel for defendant sufficient time within which to discuss the proposed  
12 resolution with her client.

13          5.       Additionally, denial of this request for continuance could result in a miscarriage  
14 of justice.

15           This is the seventh stipulation to continue filed herein.

16           DATED this 11th day of October 2022.

17          RENE L. VALLADARES  
18          Federal Public Defender

19          JASON M. FRIERSON  
20          United States Attorney

21          By \_\_\_\_\_  
22          /s/ *Nisha Brooks-Whittington*  
23          NISHA BROOKS-WHITTINGTON  
24          Assistant Federal Public Defender

25          By \_\_\_\_\_  
26          /s/ *Daniel J. Cowhig*  
27          DANIEL J. COWHIG  
28          Assistant United States Attorney

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
VICTOR RAMONE WRIGHT,  
Defendant.

Case No. 2:21-cr-00024-APG-DJA

## FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER

## **FINDINGS OF FACT, CONCLUSIONS OF LAW**

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Counsel for the defendant needs additional time to meet and discuss the government's proposed resolution with her client; and to determine whether to file a pretrial motion should her client reject the government's proposed resolution.

2. The defendant is not incarcerated and does not object to the continuance.

3. The parties agree to the continuance.

4. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendant sufficient time within which to discuss the proposed resolution with her client.

5. Additionally, denial of this request for continuance could result in a miscarriage of justice.

111

111

111

## **ORDER**

IT IS THEREFORE ORDERED that the parties herein shall have to and including November 9, 2022, within which to file the Defendant's pretrial motions.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including November 23, 2022, to file any and all responsive pleadings.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including November 30, 2022, to file any and all replies to dispositive motions.

DATED this 12th day of October 2022.

UNITED STATES DISTRICT JUDGE